

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor C. Stephen Allred, Director

April 1, 2003

#### CERTIFIED MAIL No. 7000 1670 0013 9128 9080

Mark Skinner Classic Kitchen Doors 208 E. Bower Street Meridian, ID 83642

RE:

AIRS Facility No. 001-00185, Classic Kitchen Doors, Meridian

Final Tier II Operating Permit and Permit to Construct

Dear Mr. Skinner:

The Department of Environmental Quality (Department) is issuing Tier II Operating Permit and Permit to Construct No. T2-000735 for Classic Kitchen Doors, in accordance with the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.400 - 470 and 58.01.01.200 - 228, respectively.

The enclosed permit is effective immediately and is based on the information contained in your permit application and on the relevant comments received during the public comment period. Modification to and/or renewal of this permit shall be requested in a timely manner in accordance with the Rules for the Control of Air Pollution in Idaho.

The DEQ Boise Regional Office will contact you regarding a meeting with the Department to discuss the permit terms and requirements. In addition to your facility's plant manager, the Department recommends the following representatives attend the meeting: your responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with the permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to call Mike Simon at (208) 373-0502 to address any questions or concerns you may have with the enclosed permit.

Sincerely.

Administrator

Air Quality Division

SEW/MS/sm

Permit No. T2-000735

Enclosure



# Air Quality TIER II OPERATING PERMIT and **PERMIT TO CONSTRUCT**

State of Idaho

**Department of Environmental Quality** 

**PERMIT NO: T2-000735** AIRS NO: 001-00185

AQCR: 64

CLASS: B

SIC: 2434 ZONE:

UTM COORDINATE (km): 549.2, 4828.5

#### 1. PERMITTEE

Classic Kitchen Doors Inc.

2. PROJECT

Tier II operating permit and permit to construct

	1.01 (1 applicating position and position an				
3.	MAILING ADDRESS	CITY	STATE	ZIP	
	208 E. Bower St.	Meridian	ID	83642	
4. FACILITY CONTACT TITLE		TELEPHONE			
	Mark Skinner	General Manager	(208) 888-4774		
5.	RESPONSIBLE OFFICIAL	TITLE	TELEPHONE	TELEPHONE	
	Mark Skinner	General Manager	(208) 888-47	(208) 888-4774	
6. EXACT PLANT LOCATION		COUNTY			
	208 E. Bower St., Meridian, Idaho		Ada		

#### 7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Wood Kitchen Cabinets

#### 8. PERMIT AUTHORITY

This permit to construct and Tier II operating permit is issued according to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200-228 and IDAPA 58.01.01.400-470, respectively. This permit pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be operated by this permit. Only the terms and conditions pertaining to Tier II operating permit requirements are subject to the expiration date of this permit.

This permit is not transferable to another person, place, or piece or set of equipment and will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented in the application and the Idaho Department of Environmental Quality's technical analysis of the supplied information. Changes in design or equipment that result in any change in the nature or amount of emissions may be considered a modification. Modifications are subject to Department review in accordance with IDAPA 58.01.01.200.

RED, DIRECTOR

DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED:

April 1, 2003

DATE EXPIRES: April 1, 2008

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# **ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE**

acfm actual cubic feet per minute
AQCR Air Quality Control Region

CO carbon monoxide

CFR Code of Federal Regulations

Department Department of Environmental Quality
EPA U.S. Environmental Protection Agency

IDAPA a numbering designation for all administrative rules in Idaho promulgated in accordance

with the Idaho Administrative Procedures Act

km kilometer lb/hr pound per hour

MMBtu/hr million British thermal units per hour

NO<sub>X</sub> nitrogen oxides PM particulate matter

PM<sub>10</sub> particulate matter with an aerodynamic diameter less than or equal to a nominal 10

micrometers

PTE potential to emit

SIC Standard Industrial Classification

SO<sub>2</sub> sulfur dioxide

T/hr, T/yr tons per hour, tons per year
UTM Universal Transverse Mercator
VOC volatile organic compound

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Date Issued: April 1, 2003

Location:

Meridian, Idaho

001-00185

Date Expires: April 1, 2008

# 1. PERMIT SCOPE

# **Purpose**

1.1 The purpose of this Tier II operating permit and permit to construct is to establish facility-wide air quality requirements for an existing source and protect ambient air quality standards.

1.2 No previous air permits have been issued for this source.

# Regulated Sources

1.3 Table 1.1 below lists all sources of emissions that are regulated in this permit.

Table 1.1 REGULATED SOURCES OF EMISSIONS

Permit Section	Source Description	Emissions Control(s)	
2	Natural gas-fired space heaters (3) - 0.115 MMBtu/hr (each)	None	
	Sawdust storage bins (3) Truck loadout		
3	General woodworking equipment (a detailed listing is not required for this permit)	Cyclone #1 – 5,000 acfm Cyclone #2 – 15,000 acfm Cyclone #3 – 10,000 acfm Cyclone #4 – 10,000 acfm	

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### 2. FACILITY-WIDE CONDITIONS

# Fugitive Emissions

- 2.1 All reasonable precautions shall be taken to prevent particulate matter (PM) from becoming airborne as required in IDAPA 58.01.01.651. In determining what is reasonable, considerations will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of PM. Some of the reasonable precautions include, but are not limited to, the following:
  - Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands.
  - Application, where practical, of asphalt, oil, water or suitable chemicals to, or covering of dirt roads, material stockpiles, and other surfaces which can create dust.
  - Installation and use, where practical, of hoods, fans and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations.
  - Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne
    dusts.
  - Paying of roadways and their maintenance in a clean condition, where practical.
  - Prompt removal of earth or other stored material from streets, where practical.
- 2.2 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall, at a minimum, include the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

#### Visible Emissions

- 2.3 No person shall discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, NO<sub>x</sub>, and/or chlorine gas are the only reason(s) for the failure of the emission to comply with the requirements of this section.
- 2.4 The permittee shall conduct a quarterly facility-wide inspection of potential sources of visible emissions during daylight hours and under normal operating conditions. The visible emissions inspection shall consist of a see/no see evaluation for each potential source. If any visible emissions are present from any point of emission, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 Opacity Test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report as in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each quarterly visible emission inspection and each opacity test when conducted. The records shall, at a minimum, include the date and results of each inspection and

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test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

#### Excess Emissions

2.5 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets, and breakdowns.

# Reports and Certifications

2.6 Any reporting required by this permit, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certifications, shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete. Any reporting required by this permit shall be submitted to the following:

Air Quality Permit Compliance Department of Environmental Quality Boise Regional Office 1445 N. Orchard Boise, ID 83706-2239

# Fuel-burning Equipment

2.7 The permittee shall not discharge to the atmosphere from any fuel-burning equipment PM in excess of 0.015 grains per dry standard cubic foot of effluent gas corrected to 3% oxygen by volume for natural gas.

## Monitoring and Recordkeeping

2.8 The permittee shall maintain sufficient recordkeeping to assure compliance with all of the terms and conditions of this operating permit. Records of monitoring information shall include, but not be limited to the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to Department representatives upon request.

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### 3. WOODWORKING EQUIPMENT

#### 3.1 Process Description

The facility consists of various woodworking equipment used to produce custom cabinet doors, drawer fronts, custom moldings, and millwork.

#### 3.2 Control Description

The PM emissions from all operations within the plant building(s) are controlled by four cyclones.

#### **Emissions Limits**

#### 3.3 Emissions Limits

Particulate matter (PM) and PM<sub>10</sub> emissions from the cyclones shall not exceed the following:

	PM Emissions		PM <sub>10</sub> Emissions	
Description	Hourly	Annual	Hourly	Annual
	(hr/yr)	(T/yr)	(hr/yr)	(T/yr)
#1 Cyclone	1.29	5.63	0.64	2.82
#2 Cyclone	3.86	16.89	1.93	8.45
#3 Cyclone	1.93	4.01	0.97	2.02
#4 Cyclone	1.93	4.01	0.97	2.02
Total	9.01	18.73	4.51	9.38

#### Operating Requirements

### 3.4 Cyclone Stack Discharge Configuration

Emissions from the cyclones (while in operation) shall be discharged vertically with no obstructions such as a raincap.

### 3.5 Cyclone Hours of Operation Limits

The maximum hours of operation of each cyclone is limited to 4,160 hours per consecutive 12-month period.

#### 3.6 Cyclone Operations and Maintenenace Manual

Within 60 days of issuance of this permit, the permittee shall have developed an Operations & Maintenance (O&M) manual for the cyclones. The manual shall be updated as necessary and shall include, at a minimum, the following:

- Normal operating conditions, parameters, and procedures
- Guidelines for normal maintenance and inspection schedules and procedures

The manual shall remain on site at all times and shall be made available to Department representatives upon request.

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# Monitoring and Recordkeeping Requirements

3.7 The permittee shall monitor the hours or operation of each cyclone. Records shall be maintained which provide the total hours of operation for each individual cyclone on a calendar month basis. This information shall be used to demonstrate compliance with permit condition 3.5.

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# 4. FACILITY-WIDE EMISSIONS INVENTORY

The following table provides a summary of the total emissions inventory of the facility based on PTE for criteria air pollutants.

**Table 4.1 EMISSIONS INVENTORY** 

Source Description	PM T/yr	PM <sub>10</sub> T/yr
Woodworking cyclones	18.73	9.38

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### 5. GENERAL PROVISIONS

All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit, and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code §39-101 et seq.

- 2. The permittee shall at all times (except as provided in the *Rules for the Control of Air Pollution in Idaho*) maintain and operate in good working order all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable laws for the control of air pollution.
- 3. The permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
  - To enter upon the permittee's premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit; and
  - At reasonable times, to have access to and copy any records required to be kept under the terms and
    conditions of this permit, to inspect any monitoring methods required in this permit, and to require stack
    emissions testing (i.e., performance tests) in conformance with state-approved or accepted EPA
    procedures when deemed appropriate by the Director.
- 4. Except for data determined to be confidential under Section 9-342A, *Idaho Code*, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Department of Environmental Quality.
- 5. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
- 6. In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the Director.
- 7. This permit shall be renewable on the expiration date, provided the permittee submits any and all information necessary for the Director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit such information within 60 days after receipt of the Director's request shall cause the permit to be void.
- 8. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.